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6 Attorneys for Plaintiffs
7 MAXWELL B. WILLIAMS and CLAIRE N. WILLIAMS

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 MAXWELL B. WILLIAMS and CLAIRE N.
11 WILLIAMS, individually,
12 Plaintiffs,

13 vs.

14 THE TRAVELERS HOME AND MARINE
15 INSURANCE COMPANY and THE
16 TRAVELERS INDEMNITY COMPANY;
DOES I-X; AND ROE CORPORATIONS I-X,
17 Defendants.

CASE NO. 2:20-cv-01669-JAD-BNW

**STIPULATION AND ORDER
EXTENDING ALL DISCOVERY
DATES FOR 90 DAYS**

(Second Request)

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20 IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Maxwell B. Williams and
21 Claire N. Williams (collectively "Plaintiffs") and Defendant The Travelers Home and Marine
22 Insurance Company ("THMIC") by and through their respective counsel, that all discovery
23 deadlines be extended by 90 days.

24 This is the parties second request to extend any discovery deadlines in this matter.

25 Pursuant to Local Rule 26-3, the parties state as follows:

26 **I. DISCOVERY COMPLETED TO DATE**

- 27 • The parties conducted the Fed. R. Civ. P. 26(f) conference.
28 • The parties have exchange initial disclosures of documents and list of witnesses.

- Plaintiffs have served their first set of written discovery on THIMC.
- THIMC has responded to written discovery.
- THIMC has served written discovery on the Plaintiffs.
- The Plaintiffs have responded to written discovery.

II. DISCOVERY TO BE COMPLETED

- Additional Written discovery specific to this action.
- Depositions of the Parties
- Depositions of additional non-party fact witnesses
- Expert witness discovery including disclosure of experts and expert depositions
- Identification of rebuttal experts including disclosures of rebuttal experts
- Subpoenas to non-parties

III. REASONS WHY THE DEADLINES CANNOT BE COMPLETED WITHIN THE CURRENT SCHEDULE

Good cause exists to extend the discovery schedule in this matter. THMIC has filed a Motion to Dismiss many of Plaintiffs' causes of action in this matter. Should all or some of the causes of action subject to the pending Motion be dismissed, the issues in this matter will narrow significantly. Prior to engaging experts and incurring the associated fees therewith, the parties agree that all parties would be better served if the Motion to Dismiss be decided before incurring these costs. Additionally, the ongoing COVID-19 pandemic necessitates the additional time.

IV. PROPOSED SCHEDULE

Accordingly, the parties hereby agree and stipulate to a 90-day extension of discovery dates as follows:

EVENT	CURRENT DATE	PROPOSED DATE
Discovery Cut-Off Date	6/14/2021	9/14/2021
Initial Expert Disclosure	4/14/2021	7/14/2021
Rebuttal Expert Disclosure	5/17/2021	8/16/2021
Dispositive Motions	7/14/2021	10/14/2021
Pre-Trial Order	The Joint Pre-Trial Order shall be filed no later than 30 days after the date set for	The Joint Pre-Trial Order shall be filed no later than 30 days after the date set for

	filing dispositive motions which will be 8/16/2021	filing dispositive motions which will be 11/15/2021
	If dispositive motions are timely filed, the date for filing the Pre-Trial Order shall be suspended.	If dispositive motions are timely filed, the date for filing the Pre-Trial Order shall be suspended.
Last Day to Request an Extension of these dates	5/24/2021	8/24/2021

DATED this 2nd day of April 2021

BROWN, BONN & FRIEDMAN, LLC

By: /s/ Thomas Friedman, Esq
 Thomas Friedman (NV Bar No. 7708)
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*Attorneys for Maxwell B. Williams and
 Claire N. Williams*

DATED this 2nd day of April 2021

FORAN GLENNON PALANDECH PONZI
 & RUDLOFF PC

By: /s/ Lee H. Gorlin, Esq
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*Attorneys for Travelers Home and Marine
 Insurance Company*

IT IS SO ORDERED.

United States Magistrate Judge

April 6, 2021

Dated